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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

NOV 17 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of)
)
Amendment of the Commission's Rules)
to Establish New Frequencies for) RM-8094
Cordless Telephones near 44 and 49 MHz)

**REPLY COMMENTS OF
UNIDEN AMERICA CORPORATION**

INTRODUCTION

1. Uniden America Corporation (hereinafter "Uniden") respectfully submits its reply comments to the above captioned petition to request an amendment of the Commission's Rules.

DISCUSSION

2. Uniden is pleased by the fact that all comments submitted to the Commission, in response to the above captioned rule making proceeding, are in support of the Telecommunications Industry Association, Personal Communications Section's (PCS) petition. Thomson Consumer Electronics, Inc. (Thomson) raised a valid concern, one which had been discussed during meetings of the PCS since the petition was filed. Thomson

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pointed out an important aspect in the petition that, as written, requires the monitoring of a frequency before transmission begins on that specific frequency.

3. As proposed, a cordless telephone system would conceivably be required to incorporate four separate receivers just to meet the requirements of this mandate. To explain, a cordless telephone base unit, as well as a cordless telephone remote unit, consists of a separate receiver and transmitter in each unit to accomplish the duplex operation required for compatibility with the telephone network. If each unit is required to monitor its own transmitter frequency, then it would be necessary to have the capability of receiving both the normal receive frequency as well as the transmit frequency.

4. After an analysis of the above scenario, Uniden supports the basic concept detailed by Thomson which would allow a brief transmission of a digitally coded signal in order to establish a communications path for cordless telephones.

5. The spirit of the petition is still met in that the cordless telephone system would monitor the transmit frequencies of both the base and remote units although the actual monitoring would be accomplished by the reciprocating unit. In other words, the base unit would monitor the transmit frequency of the remote unit, and the remote unit

would monitor the transmit frequency of the base unit. If another signal is detected during this monitoring procedure, further transmission on the affected frequency would be inhibited.

6. Another consideration that supports Thomson's solution for this matter is that there would be virtually no interference to the primary users of the frequencies identified in the petition due to the "flea-power" of the cordless telephone transmitter. Uniden believes that the transmission of a brief radio signal would not increase the potential of interference by any significant factor. It would be prudent for any cordless telephone manufacturer to keep the transmission time to a minimum because the most likely candidate to suffer interference would be other cordless telephone users. The marketplace alone would be the driving force to keep this risk of co-channel emissions from creating a problem. Uniden will support a reasonable restriction upon the duration of a digital coded transmission necessary to establish communications between the cordless telephone base and remote units.

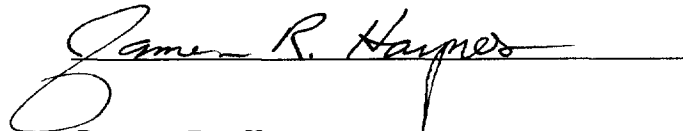
CONCLUSION

7. Because of the support of the commenters and the apparent lack of any opposition from other interested parties, Uniden urges the Commission to issue a Notice of

Proposed Rule Making (NPRM) allowing cordless telephones to utilize the new fifteen frequency pairs identified in the captioned petition. Additionally, Uniden requests that a slight change to this petition be incorporated in the NPRM which would allow a cordless telephone to make a brief transmission before monitoring, to determine frequency occupancy before establishing a communication path.

Respectfully submitted,

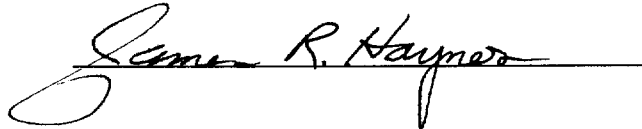
UNIDEN AMERICA CORPORATION



James R. Haynes
Chief Engineer

CERTIFICATE OF SERVICE

I, James R. Haynes, hereby certify that pursuant to the requirements in 47 CFR 1.405(b), copies of the foregoing Reply Comments of Uniden America Corporation have been served by first class United States mail, with the postage prepaid, to the parties listed below.

A handwritten signature in cursive script, reading "James R. Haynes", is written over a horizontal line.

James R. Haynes

November 16, 1992

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